

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,) Case No. 3:21CR00157-JJH
)
Plaintiff,) **JUDGE HELMICK**
)
Vs.)
SIR MAEJOR PAGE,) **MOTION FOR AUTHORIZATION**
) **TO TRAVEL FOR DEPOSITION,**
Defendant.) **RETAIN COURT REPORTER**
) **AND ORDER TRANSCRIPT**
)
) Charles M. Boss (0011436)
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)
) **ATTORNEY FOR DEFENDANT**
) **SIR MAEJOR PAGE**
)
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During the pretrial on January 18, 2024, counsel for Defendant Sir Maejor Page advised the court that he anticipated calling James Hasson an attorney licensed in the State of Georgia as a witness for the defense. The court then instructed counsel to obtain a deposition for the witness to determine the nature and scope of the permissible testimony.

Attorney James Hasson was retained by defendant Page in August 2020 to provide professional services and advice to the entity known as Black Lives Matter of Greater Atlanta, Inc. The professional advice was pertaining to the retroactive reinstatement of the Not-for-

Profit Corporation status of Black Lives Matter of Greater Atlanta (BLMGA) in the State of Georgia and retroactive reinstatement of Black Lives Matter of Greater Atlanta (BLMGA) Tax-Exempt Status with IRS. Witness Hasson also counseled defendant Page on the operation of Not-for-Profit Tax-Exempt Entities.

The deposition is necessary for the court to determine the potential scope of the witness testimony. Whether he will be allowed to testify as an expert witness, fact witness or “Dual Role” witness.

The deposition has been scheduled to take place in Atlanta, Georgia on February 12, 2024, at the professional offices of the Hasson Law Group, LLP located at 3379 Peachtree Rd. NE, Suite 625, Atlanta, Georgia 30326. AUSA Gene Crawford and Robert Melching have indicated that “we will be there”.

Defendants counsel have been advised by Leeann Webber, financial specialist U.S. District Court Northern District of Ohio, that the court authorization for travel with the dates of travel, travel location, and purpose of travel needs to be approved by the court. Once approved counsel will make travel arrangements for airfare with National Travel Service. Hotel and meals are to be paid for by counsel, at the government rate, and reimbursed under the authority of the Criminal Justice Act (CJA).

Authorization is also sought to retain the services of a court reporter and obtain transcript of the deposition for the court to review.

WHEREFORE, It is respectfully requested that this Honorable Court authorize counsel to retain the services of a court reporter, order a transcript of the deposition, and for Charles M. Boss and Mark C. Geudtner to travel for the purposes of taking the February 12, 2024 deposition of James K. Hasson in Atlanta, Georgia.

Respectfully submitted,

BOSS & VITOU Co., L.P.A.

/s/ Charles M. Boss

By: Charles M. Boss
Attorney for Defendant
Sir Maejor Page

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the **MOTION FOR AUTHORIZATION TO TRAVEL FOR DEPOSITION, RETAIN COURT REPORTER AND ORDER TRANSCRIPT** was filed electronically this 19th day of January, 2024. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt.

Respectfully submitted,

BOSS & VITOU Co., L.P.A.

/s/ Charles M. Boss

By: Charles M. Boss
Attorney for Defendant
Sir Maejor Page